

March 3, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

Federal Communications Commission (FCC) action on USF reform appears to be imminent.¹ Pembroke Telephone, a rural local exchange carrier (SAC 190243) in Virginia understands the need to improve the rural support system, and applauds the FCC's progress on this important issue.

Pembroke Telephone is concerned, however, with proposals suggesting the FCC preclude companies with widespread 10/1 Mbps availability from opting into the model and alternate proposals suggesting the FCC divert CAF reserve funds away from model adopters who have already deployed 10/1 service.² Pembroke Telephone understands the desire to focus USF resources where they are most needed, but agrees with NTCA that "measures of 10/1 service based upon Form 477 data could yield illogical and even troubling results."³

In fact, the data filed for Pembroke Telephone in the September 2015 477 Filing did not accurately represent Pembroke Telephone's actual 10/1 Mbps coverage. Pembroke Telephone has filed a revised Form 477. The revised filings will show significantly lower (but more accurate) 10/1 availability.

Pembroke Telephone requests the FCC utilize the most recent Form 477 information available in making key USF reform decisions. Utilizing outdated Form 477 information could have a serious adverse impact on Pembroke Telephone, inappropriately precluding it from model participation.

¹ Chairman Wheeler's blog post "Bipartisan Solutions for Universal Service." Accessed at www.fcc.gov/news-events/blog/2016/02/19/bipartisan-solutions-universal-service.

² WTA ex parte filing dated May 15, 2015 stating "CAP reserves should be focused upon study areas that have lower percentages of 10/1 broadband build-out." Accessed at <http://apps.fcc.gov/ecfs/document/view;NEWECFSSSESSION=yGWLvWfnQNV95KvI31z6LgBW4v0knJtmTr2PJp20bGJ2V5GcpyB!-668154738!683247717?id=60001048973>.

³ NTCA ex parte filing dated Dec 15, 2015. Accessed at <http://apps.fcc.gov/ecfs/document/view;NEWECFSSSESSION=tcGvWYwYNjK2v5q3vT6hwKWGGvFvr4xvqFkD0yFZ8iLBGGmgNTW0!1749169674!-22619469?id=60001356976>.

Pembroke Telephone provides a modern suite of services for its members and hopes model participation will provide an opportunity to continue making prudent investments to serve its communities.

If any additional information on this matter can be helpful to the FCC, please let us know.

Sincerely,


Lisa W. Epperley
General Manager
Pembroke Telephone Cooperative